

Performance & Reporting Requirements

Why Does WIA Require the Submission of Performance Data?

In August of 1998, President Bill Clinton signed the Workforce Investment Act into law, replacing former government assistance programs offered under the Job Training Partnership Act (JTPA). The primary objective of the Workforce Investment Act (WIA) is to provide a means for enhancing the quality of life for certain segments of the American population, in particular dislocated workers, the underemployed, and welfare participants. The Workforce Investment Act further seeks financial and educational empowerment by assisting disadvantaged individuals in obtaining the skills and credentials necessary for gainful employment. An essential feature of the Workforce Investment Act is the "Customer Choice" orientation of the program. Individuals seeking assistance through WIA funding have the freedom of choice in selecting the training program that best fits their personal and career needs. As such, it is important that customers receive accurate information regarding the performance records of all training providers eligible to participate in the WIA program. Informed customer choice requires a stringent system of accountability for all certified training providers. Since the goal of the Workforce Investment Act is to obtain gainful employment, providers must demonstrate that those students, who complete their certified program, have increased employment opportunities.

How and Where Do Providers Submit the WIA Quarterly Performance Report?

There are two methods for submitting WIA quarterly performance reports:

1. **Mail** - Providers may mail the report on a 3.5 inch diskette to the WIA office at the following address:
Tennessee Higher Education Commission
ATTN: Workforce Investment Act / Dr. Roosevelt L. Noble
404 James Robertson Parkway, Suite 1900
Nashville, TN 37243-0830
2. **Email** – Providers may email the report to the Director of the WIA with the Tennessee Higher Education Commission at:
Roosevelt.Noble@state.tn.us

Notes:

- A. Providers must submit the report in its entirety using one of the two submission options. For example, emailing one portion and mailing the other is not acceptable.
- B. Providers who send an email correspondence to the email address listed above will be added to the mass email list of WIA Providers. Once added to this list, you will receive friendly reminders and blank copies of the report forms approximately 21 days before each report deadline.

When Are the Quarterly Performance Reports Due?

The quarterly performance reports are due in the Office of the Workforce Investment Act on the 15th day following each quarter. Specifically, the report periods and due dates are as follows:

Quarter	Time Period			Due Date
1 st	July 1	Through	September 30	October 15
2 nd	October 1	Through	December 31	January 15
3 rd	January 1	Through	March 31	April 15
4 th	April 1	Through	June 30	July 15

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What Are WIA Certified Providers Required to Report?

All WIA certified training providers are required to submit quarterly reports detailing program progress for both their WIA and ALL of student populations. "ALL of student" refers to the total number of students, and not just the number of Non-WIA students. WIA students are a component of the figures describing the ALL of student population. In each report, the certified provider documents the number of newly enrolled students, dropouts, completers, the number still enrolled, etc. In addition, when a student successfully completes a certified training program the provider submits the student's social security number for the obtainment of wage information. The Tennessee Higher Education Commission submits the student's social security number to the Division of Employment Security with the Tennessee Department of Labor and Workforce Development for Unemployment Insurance Wage Records, and to the Wage Record Interchange System (WRIS). Effective evaluation of each training program requires that providers submit all of the above information for both the WIA and ALL of student populations.

What Are the Consequences for Failure to Report or Submitting Late Reports?

Failure to Report:

Providers who fail to submit a performance report are subject to the *Schedule of Consequences* designed to address such issues. The *Schedule of Consequences* involves three levels of action beginning at level one, where a simple reminder note is sent to the provider stating that the WIA office has not received the mandated performance report by the report deadline. At level two of the *Schedule of Consequences* the provider is temporarily suspended from the *Statewide List of Eligible Training Providers* and all 13 of the local workforce investment boards and the Department of Labor and Workforce Development are informed of the provider's suspension status. At level three of the *Schedule of Consequences* the provider is permanently removed from the Statewide List for a period of two consecutive quarters.

Submitting Late Reports:

Providers determined to be *Habitual Delinquents* are subject to a 30 day suspension from the Statewide List. *Habitual Delinquency* is defined as either of the following actions:

1. Reaching level one of the Schedule of Consequences in three consecutive quarters.
2. Reaching level two of the Schedule of Consequences in two consecutive quarters.

In the event that a provider reaches the *Habitual Delinquency* category, the WIA Office will send an informative memo before the next report date informing the provider that the upcoming report must be received on time or the provider faces a 30 day suspension from the Statewide List. If the suspension is issued, all 13 of the local workforce investment boards and the Department of Labor and Workforce Development are informed of the provider's suspension status.

Are There Any Exemptions From the WIA Reporting Obligation?

There are three exemptions concerning the WIA quarterly reports.

1. Providers who submit annual enrollment and graduation data to the Tennessee Board of Regents (TBR), i.e. Tennessee Technology Centers, 4-Year Universities, and Community Colleges do not have to report performance data for the "ALL" of student populations, since the WIA office obtains this information annually from TBR. These providers are required, however to submit an enrollment and completion report for their WIA student population.

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- Any provider whose initial application into WIA was certified during the report quarter and they did not receive a WIA student during that time, is not required to begin submitting WIA quarterly reports to THEC until they receive their first WIA student. However, if the minimum of one WIA student was enrolled during the time after certification, the provider is required to submit a performance report.
- Any provider that has **NEVER** received a WIA student does not have to complete a quarterly performance report until they receive their first WIA student. This exemption does not refer to the quarter of the report, but rather the period that covers the provider's initial inception into WIA up through the report deadline. Subsequently, after one WIA student is received, the provider is required to forever report on that particular program.

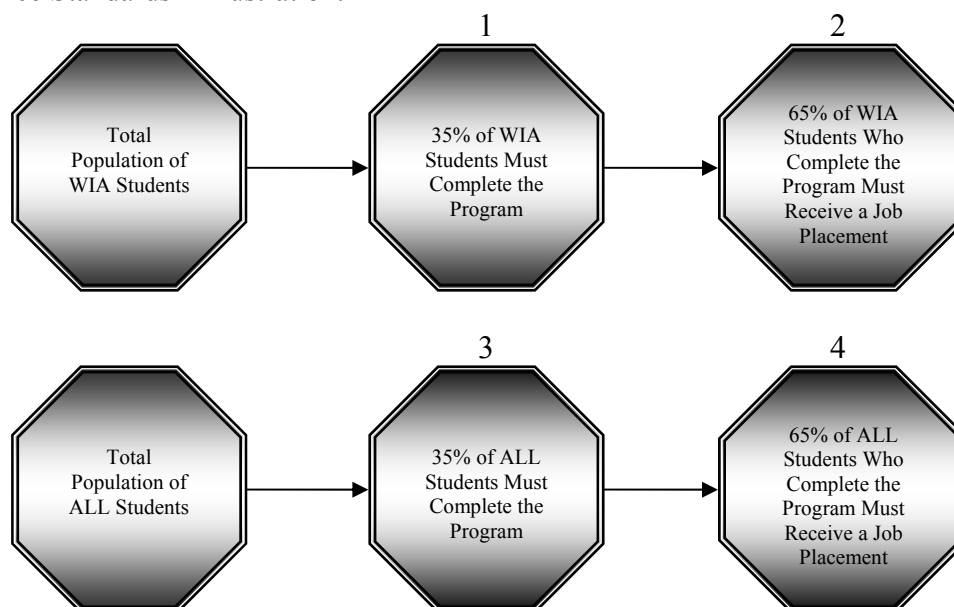
What are the Performance Standards that a Program Must Meet in Order to Remain on the Tennessee Statewide List of Eligible Training Providers?

To remain subsequently eligible to receive WIA funds, each certified program must meet one of four performance standards.

Performance Standards – In Words:

- The **WIA completion rate** for each program must be equal to or greater than the average completion rate of Tennessee State institutions, which is currently 35 percent.
- The **WIA placement rate** for each program must be equal to or greater than the minimum placement rate for determination of Performance Funding Incentive Points in Tennessee State institutions, which is currently 65 percent.
- The **ALL of student completion rate** for each program must be equal to or greater than the average completion rate of Tennessee State institutions, which is currently 35 percent.
- The **ALL of student placement rate** for each program must be equal to or greater than the minimum placement rate for determination of Performance Funding Incentive Points in Tennessee State institutions, which is currently 65 percent.

Performance Standards – Illustration:



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Any certified program receiving at least 10 WIA students that fails to meet a minimum of one of the four performance measures is subsequently ineligible for placement on the *Statewide List of Eligible Training Providers*. Those programs removed from the list are eligible for reinstatement at the end of the suspension period, which expires at the conclusion of each fiscal year.

How Are the Performance Standards Calculated?

The completion and placement rates are calculated as follows:

Completion Rate =

$$\left[\frac{\text{Total Number of Program and Course Completers}}{(\text{Total Number Enrolled}) - (\text{Total Number Still Enrolled})} \right] * 100$$

Placement Rate =

$$\left[\frac{\text{Total Number of Placements According to UI Data}}{\text{Total Number of Program and Course Completers}} \right] * 100$$

What is the Difference Between a Program and a Course Completer?

A course completer is an individual whose goal on their WIA Training Participant Form was to complete only one course or a series of courses, but not an entire program. If the individual completes the pre-stated course, they are recorded on the performance report forms as a course completer. On the other hand, a program completer is an individual whose goal is to complete an entire program. Subsequently, if the training participant form list the student's goal as the completion of the entire program, then any proportion of time completed other than the program in its entirety DOES NOT count as a completion. The WIA Training Participant Form should be obtained from the WIA caseworker at the Tennessee Career Center that referred the student.

Who Counts as the "Number Still Enrolled"?

The WIA quarterly performance reports are time specific. As such, there is the possibility that the report due date, may not coincide exactly with the completion date for a certified program. In which case, at the time that the quarterly report is due in the WIA office, any student who has not completed their certified program and is still currently enrolled, is counted under the "Number Still Enrolled". The WIA office subtracts these individuals out of the performance equation, so that the number still enrolled does not adversely affect the completion rate.

What Happens if I Forget to Report the Number Still Enrolled?

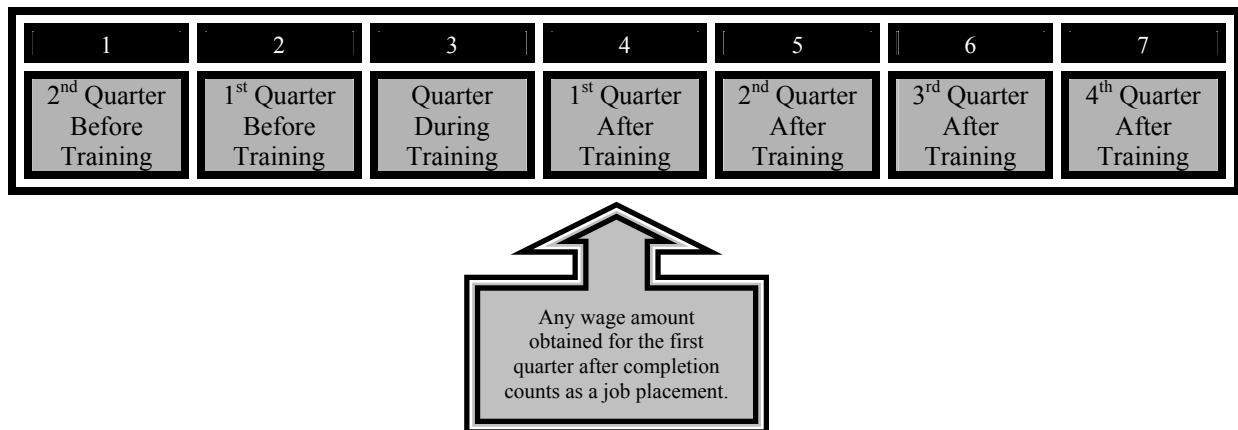
Failure to report the number of individuals still enrolled in the certified program at the time of the report due date, can seriously deflate the obtained completion rate. For example, if a program had 10 students enrolled during the report quarter, six students completed, and four students who were still enrolled at the report due date, then their actual completion rate for that quarter is 100 percent. However, if the provider neglects to report that four students were still enrolled, we assume that the four students dropped out during the quarter, and assign a completion rate of 60 percent.

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What is Considered a Job Placement?

After each participant completes a WIA certified program, it is the responsibility of the training provider to submit his or her social security number on Form F or Form E back to the WIA offices at the Tennessee Higher Education Commission for the purpose of conducting a wage investigation. When our office receives a social security number for a course or program completer, we submit that information to the Division of Employment Security with the Department of Labor and Workforce Development. The Unemployment Insurance data details wage records for each individual completer across the state of Tennessee. In addition, the Wage Record Interchange System (WRIS), checks for wages across the country as well as within Tennessee.

In a secured file, our office receives five to seven quarters of wage information for each completer. Specifically, we obtain wages for the two quarters before the individual completed the program, the quarter during training, and the four quarters after training. Only those individuals with a reported wage amount during the quarter immediately following the completion of a certified training program are classified as a job placement. The obtained wage amount does not have to be in the individual's particular field of study, and our office does not know which employer the particular wage came from.



Are the Other Quarters of Wages Ever Used in the Performance Report?

In the 2002 report, the wages obtained from the Unemployment Insurance Wage Records served only to indicate placements in the first quarter following completion and in the detailed wage summaries. However, given the amount of wage information obtained, future reports will contain far more advanced forms of statistical analysis. For example, the 2003 report should include the following:

- A. *Unemployment-to-Work Assessment:* A summary of the number of individuals who were unemployed before completing a certified training program, and were subsequently placed in the quarter immediately following completion. This type of analysis will permit a determination of the extent to which WIA funds are assisting those who are unemployed obtain gainful employment.
- B. *Training Benefit Assessment:* A comparison of the average salary for individuals employed the quarter before training to their average salary the quarter following training. With such analysis, we can determine the extent to which WIA enhanced the quality of life for individuals employed prior to training.

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- C. *Long Term Placement Rate Assessment:* Assessment of two placement rates covering a span of two quarters. The first placement rate will reflect the number of participants employed the quarter immediately following completion of a certified training program. The second placement rate will reflect the number of participants employed in the first or second quarter immediately following the completion of a certified training program. The intent of the second option is to reflect a better placement rate for training programs that require an additional license or examination upon completion before a participant can begin to work in that particular field. It is assumed that by two quarters after completion, the participant should have fulfilled their additional obligation, and is then eligible for employment.

When Does a Program Become Eligible for Subsequent Eligibility Considerations?

The procedures for determination of subsequent eligibility include a review of each certified training program that has served at least 10 WIA students since its initial inception onto the *Statewide List of Eligible Training Providers*. The annual performance report includes performance analysis for all certified programs that received a minimum of one WIA student. However, only those programs with a minimum of 10 WIA students enrolled are considered in subsequent eligibility decisions. Essentially, if a program has not served a minimum of 10 WIA students, it cannot be removed from the Statewide List for failure to meet the performance standards.

Which Agency is Responsible for Making Subsequent Eligibility Decisions?

During the implementation stage of the Workforce Investment Act in Tennessee, Governor Don Sundquist designated the Tennessee Higher Education Commission (THEC) as the state agency responsible for maintaining the *Statewide List of Eligible Training Provider*. The Commission's experience as the state-authorizing body for Postsecondary School Authorization well positioned the agency for developing and maintaining a statewide list of WIA certified providers and programs. As part of maintaining the list, THEC evaluates quarterly and annual performance data to determine subsequent eligibility to the *Statewide List of Eligible Training Provider*.